



Early Journal Content on JSTOR, Free to Anyone in the World

This article is one of nearly 500,000 scholarly works digitized and made freely available to everyone in the world by JSTOR.

Known as the Early Journal Content, this set of works include research articles, news, letters, and other writings published in more than 200 of the oldest leading academic journals. The works date from the mid-seventeenth to the early twentieth centuries.

We encourage people to read and share the Early Journal Content openly and to tell others that this resource exists. People may post this content online or redistribute in any way for non-commercial purposes.

Read more about Early Journal Content at <http://about.jstor.org/participate-jstor/individuals/early-journal-content>.

JSTOR is a digital library of academic journals, books, and primary source objects. JSTOR helps people discover, use, and build upon a wide range of content through a powerful research and teaching platform, and preserves this content for future generations. JSTOR is part of ITHAKA, a not-for-profit organization that also includes Ithaka S+R and Portico. For more information about JSTOR, please contact support@jstor.org.

CURRENT DECISIONS

ADMIRALTY—ACTION FOR MARITIME TORT MAY BE BROUGHT AT COMMON LAW.—While the plaintiff, a longshoreman, was working on board the defendant's vessel in the North River, he was seriously injured by falling through a hatchway which had been negligently left open by his foreman. The defendant had complied with the provisions of the New York Workmen's Compensation Law (Laws, 1914, ch. 41). The trial court granted the defendant's motion to dismiss the case on the ground that the plaintiff had failed to prove facts sufficient to constitute a cause of action. *Held*, that there should be a new trial. *Kennedy v. Cunard Co.* (1921) 197 App. Div. 459, 189 N. Y. Supp. 402.

There can be no recovery for a maritime tort under a state workmen's compensation statute. *Southern Pacific Co. v. Jensen* (1917) 244 U. S. 205, 37 Sup. Ct. 524; *Knickerbocker Ice Co. v. Stewart* (1920) 253 U. S. 149, 40 Sup. Ct. 438. The plaintiff was remitted to the remedies he would have had if no compensation act had existed, and one of those remedies was an action at common law in a state court. For a comprehensive discussion of the problems of jurisdiction here involved, see COMMENTS (1917-18) 27 YALE LAW JOURNAL, 255, 924; (1919) 28 YALE LAW JOURNAL, 835; (1920) 29 YALE LAW JOURNAL, 925.

CONFLICT OF LAWS—ENFORCEMENT OF FOREIGN JUDGMENTS.—The claimant obtained a judgment in Malta against the estate of a testator, declaring that the testator was the father of the claimant's illegitimate child, and ordering the indefinite payment of an annuity to her out of his estate. In the English administration of the testator's estate the claimant sought to enforce payment of the arrears. *Held*, that the claim should be denied (1) because it was based upon facts which would give rise to no cause of action in England, being contrary to public policy, and (2) because the judgment was not final, being subject to modification according to the necessities of the child. *Macfarlane v. Macartney* [1921] 1 Ch. 522.

The decision is in accord with the requisites of the English courts in the enforcement of foreign judgments. See Lorenzen, *The Enforcement of American Judgments Abroad* (1920) 29 YALE LAW JOURNAL, 268, 289. The American courts do not look upon the rights of illegitimate children with such disfavor. See (1919) 28 YALE LAW JOURNAL, 518. In this country, too, a judgment for alimony in another state is final as to past installments *actually* due, and as such is entitled to full faith and credit under the Federal Constitution. *Sistare v. Sistare* (1910) 218 U. S. 1, 30 Sup. Ct. 682.

EVIDENCE—ADMISSIBILITY OF SKULL OF DECEASED IN MURDER TRIAL.—The defendant was convicted of murder in the second degree. At the trial, the skull of the deceased, substantially in the same condition as when it was amputated from the body, was admitted in evidence to furnish an ocular inspection to the jury of the places of exit and entry of the bullet that produced death. The defendant assigned its admission as error on the ground that it tended to improperly influence the jury. *Held*, that there was no error in the admission of the skull as evidence. *Larmon v. State* (1921, Fla.) 88 So. 471.

The decision follows the rule applied in the great majority of American courts. It is generally held that the skull of a deceased is admissible in evidence when it furnishes an ocular demonstration to the jury, helpful to them in arriving at their verdict. *Thrawley v. State* (1899) 153 Ind. 375, 55 N. E. 95; *State v. Mariano* (1914) 37 R. I. 168, 91 Atl. 21; *State v. Rodriguez* (1917) 23 N. M. 156, 167 Pac. 426; Wharton, *Criminal Evidence* (10th ed. 1912) sec. 518 C; 12 L. R. A.